

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**07-cv-7825**

ROCHELLE GREGORY,

Plaintiff,

-against-

ANSWER TO  
COMPLAINT

NIAGARA CREDIT SOLUTIONS, INC.,

Defendant.

Judge Sullivan

- - - - - X

Defendant, NIAGARA CREDIT SOLUTIONS, INC., by its attorney Arthur Sanders, as and for its answer to the complaint of plaintiff, alleges as follows:

1. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in paragraph "1" of the Complaint.

2. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in paragraph "2" of the Complaint.

3. Defendant admits the allegation contained in paragraph "3" of the Complaint.

4. Defendant denies that the Court has jurisdiction and denies that venue is proper as neither plaintiff nor defendant reside or have an office in the Southern District of New York.

5. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in paragraph "5" of the Complaint.

6. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in paragraph "6" of the Complaint.

7. Defendant admits the allegation contained in paragraph "7" of the Complaint.

8. Defendant admits contacting plaintiff by telephone.

9. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in paragraph "9" of the Complaint.

10. Defendant denies knowledge or information sufficient to form a belief with respect to the truth of the allegation contained in paragraph "10" of the Complaint.

11. Defendant denies the allegation contained in paragraph "10" of the Complaint.

12. Defendant denies the allegation contained in paragraph "10" of the Complaint.

13. Defendant denies the allegation contained in paragraph "14" of the Complaint.

14. Defendant denies the allegation contained in paragraph "15" of the Complaint.

15. Defendant denies the allegation contained in paragraph "16" of the Complaint.

16. Defendant denies the allegation contained in paragraph "17" of the Complaint.

17. Defendant denies the allegation contained in paragraph "18" of the Complaint.

18. Defendant denies the allegation contained in paragraph "19" of the Complaint.

19. Defendant denies the allegation contained in paragraph "20" of the Complaint.

20. Defendant denies the allegation contained in paragraph "21" of the Complaint.

21. Defendant denies the allegation contained in paragraph "22" of the Complaint.

22. Defendant denies the allegation contained in paragraph "23" of the Complaint.

WHEREFORE, defendant, NIAGARA CREDIT SOLUTIONS, INC., requests Judgment dismissing the complaint with prejudice and denying all requested relief therein, together with such other and further relief as the Court deems just and proper, including costs and reasonable attorneys' fees.

Dated: Spring Valley, New York  
October 4, 2007

/S/  
ARTHUR SANDERS, ESQ. (AS-1210)  
Attorney for defendant  
2 Perlman Drive - Suite 301  
Spring Valley NY 10977-5230  
845-352-7272

TO: Amir J. Goldstein, Esq. (AG-2888)  
Attorney for plaintiff  
591 Broadway - Suite 3A  
New York NY 10012

**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2007 the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and or the Southern District's Rules On Electronic Service upon the following parties and participants:

Amir J. Goldstein, Esq.

/S/\_\_\_\_\_  
ARTHUR SANDERS